## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

ADVANCED CELLULAR SYSTEMS, CORP.

Plaintiff

v.

PUERTO RICO TELEPHONE COMPANY; CELULARES TELEFONICA

Defendants

Civil No. 97-2511 (JAF)

Civil Action: Antitrust Laws;

Discriminatory Pricing; Breach of

Contract;

Tort; Collection of Monies

Jury Trial Demanded

## LEAVE TO FILE REPLY TO PRTC'S OPPOSITION

## TO THE HONORABLE COURT:

COMES NOW, plaintiff Advanced Cellular Systems, Corp. ("ACS") (hereinafter Plaintiff), through their undersigned attorneys, and very respectfully states and prays as follows:

1. On May 7<sup>th</sup>, 2007 the Defendant filed "Opposition of PRTC to Plaintiff's Motion for Reconsideration" in response to our "Motion for Reconsideration and/or for Additional Determinations of Facts and of Law and/or Requesting Judgment and

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Requesting Oral Argument." On its motion, defendant raises some issues that require the appearing party's an appropriate response and clarification.

2. Therefore, and pursuant to Federal Local Rule 7(c), Plaintiff respectfully request this Honorable Court leave to file a brief reply to defendant's opposition.

**WHEREFORE,** Plaintiff respectfully requests from the Honorable Court leave to file a brief reply to defendant's opposition.

I hereby certify that on May 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Ricardo F. Casellas, Esq., Ricardo L. Ortiz Colón, Esq. and Mario Arroyo Dávila.

In San Juan, Puerto Rico, this 15th day of May 2007.

s/ Zuleika Llovet-Zurinaga Zuleika Llovet-Zurinaga, 201407 Attorney for plaintiff Advanced Cellular Systems P.O. Box 366048 San Juan, Puerto Rico 00936-6048 Tel. (787) 250-1979 / Fax (787) 250-8432 E-mail: zllovet@llovetlopez.com

s/ Jairo Mellado-Villarreal Jairo Mellado-Villarreal, 208112 Attorney for plaintiff Advanced Cellular Systems MELLADO & MELLADO-VILLARREAL 165 Ponce de León Ave., Suite 202 San Juan, Puerto Rico 00917-1233 Tel. 787-767-2600/Fax 787-767-2645 E-mail: jmellado@mellado.com